

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

LETASHA MYATT, on behalf of herself      )  
and others similarly situated,              )  
  )  
Plaintiff,                                  )  
  )  
v.   )   CASE NO. 1:10-CV-64-TLS  
  )  
ALLEN COUNTY SHERIFF KEN FRIES      )  
(in his official capacity),              )  
  )  
Defendant.                                 )

**PLAINTIFF'S PROPOSED VERDICT FORM**

Plaintiff, LeTasha Myatt, on behalf of herself and others similarly-situated, by counsel, requests that the Court submit to the jury, after the close of evidence and final argument, the following proposed Verdict Form.

Respectfully submitted,

**CHRISTOPHER C. MYERS & ASSOCIATES**

s/Christopher C. Myers

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Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned hereby swears that a true and correct copy of the foregoing document was sent, via United States Mail, ECF, postage prepaid, or by some other means acceptable to this Court, on this 15<sup>th</sup> day of December, 2014, to the following:

John O. Feighner  
J. Spencer Feighner  
Haller & Colvin, P.C.  
444 E. Main Street  
Fort Wayne, IN 46802-1910

s/Christopher C. Myers  
Christopher C. Myers

CCM/jjs  
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**PLAINTIFF'S PROPOSED VERDICT FORM NO. 1**

We the jury, on the issue of the value of the loss of liberty suffered by the Plaintiff and others similarly-situated, determine that value of the loss of liberty is to be measured at the rate of \$\_\_\_\_\_ per hour for each hour of deprivation of liberty suffered by each class member.

Date: \_\_\_\_\_

\_\_\_\_\_  
Foreman